EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAT THANH LUONG, DECEASED, through his co-Successors in Interest, AI QIONG ZHONG, Individually and as mother and Next Friend for W.L., a minor, and MAI CHAU, individually,

Plaintiffs,

vs.

ALAMEDA COUNTY, a public entity; SHERIFF GREG AHERN; JAIL COMMANDER THOMAS MADIGAN; DR. RINATA WAGLE, M.D.; ESTATE OF MOHINDER KAUR, M.D.; JACKSON & COKER LOCUMTENENS, LLC; BONNIE COOK, MFT; DEPUTY BRANDEN MCBRIDE; SHERIFF'S TECHNICIAN ROBERT LUEBKER; SHERIFF'S TECHNICIAN BRITANNI MARTINEZ; SHERIFF'S TECHNICIAN KARL ENZMANN; DEPUTY SCOTT BRYNING; DEPUTY SHAWN CHRISTIANSEN; NAPA STATE HOSPITAL, CALIFORNIA DEPARTMENT OF STATE HOSPITALS, a public entity; PAM AHLIN; DOLLY MATTEUCCI; PATRICIA TYLER, M.D.; CINDY BLACK; and DOES 7-20, Jointly and Severally,

Defendants.

Case No. 3:17cv6675 EMC

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DEPOSITION OF
TUYET MAI LUONG
June 14, 2019

Reported by:
CLARE MACY, RPR, CSR #5256

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BE IT REMEMBERED that, pursuant to Notice of Deposition, and on Friday, June 14, 2019, commencing at the hour of 1:22 p.m., in the Office of the Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, California, before me, Clare Macy, a certified shorthand reporter in the State of California, there personally appeared

MIMI LAIN,

has sworn, to the best of her ability, to interpret from the language of English to Cantonese and from Cantonese to English.

TUYET MAI LUONG,

called as a witness by the Defendants, who being by me first duly sworn, was thereupon examined and interrogated as is hereinafter set forth.

--oOo--

APPEARANCES

MAYA RODRIGUEZ SORENSEN, Attorney at Law, of Haddad & Sherwin LLP, 505 Seventeenth Street, Oakland, California 94612, appeared as counsel on behalf of the Plaintiffs.
Tel: 510.452.5500
Email: maya@haddadsherwin.com

CAROLYN O. TSAI, Deputy Attorney General, of Office of Attorney General, 455 Golden Gate Avenue, Suite 11000, San Francisco, California 94102-7004, appeared as counsel on behalf of the Defendants.
Tel: 415.510.3539 Fax: 415.703.1234
Email: Carolyn.Tsai@doj.ca.gov

ALSO PRESENT:
Mimi Lain, Interpreter
Winnie Chan, Interpreter
Nina Luong

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Q. Did your brother confide in you?
A. Sometimes.
Q. And what sort of things did he confide in you about?
A. Sometimes he talked about his job. For example, when he was laid off, he was not happy. He was rather worried that he would not be able to find a job that he enjoys doing.
Q. Did you occasionally have fights or arguments?
A. No.
Q. Did you ever go through any periods where you stopped talking to each other?
A. No.
Q. Are you aware of him refusing to talk to anyone in your family for any period of time?
A. No.
Q. So, you and Mr. Luong grew up as children in the same house in Vietnam; is that correct?
A. Yes.
Q. And at the time you left Vietnam, was it necessary to escape?
A. Yes.
Q. And did you escape on a boat?
A. Yes.
Q. And where did you land when you got off the

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boat?
A. Indonesia.
Q. And how long did you remain in Indonesia?
A. About a little over a year.
Q. Where in Indonesia did you live during that year?
A. It's a refugee camp.
Q. And what island?
A. Galang. I don't know how to spell it.
Q. Did you ever live in China?
A. No.
Q. Your brother at one point was reported to have said that he wanted to go home to Beijing. This is in a -- a medical report. Did you ever know him to live in Beijing?
A. I am not aware.
Q. How old were you when you arrived in the United States in 1980?
A. Approximately 18 years old.
Q. And how old was Mr. Luong?
A. Nineteen years old. He's one year older.
Q. When you arrived, did you start working immediately?
A. No.
Q. Were you able to take some classes?

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A. Yes.
Q. And did you attend a school?
A. Yes.
Q. What school did you attend?
A. I went to adult school to study. I also went to college.
Q. And that was in Redwood City?
A. Yes.
Q. Did your brother, Mr. Luong, do the same?
A. Yes.
Q. So the two of you took classes together in Redwood City in 1980, when you arrived?
A. We went to the same school. However, we did not attend the same classes.
Q. I understand. Thank you.
And when did you get married?
A. 1989.
Q. Did you marry someone you knew in Vietnam?
A. Yes.
Q. And I assume Mr. Luong was able to attend your wedding?
A. Yes.
Q. And when did Mr. Luong get married?
A. 2000.
Q. And were -- did you attend his wedding?

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A. Yes.
Q. Did you ever financially support Mr. Luong after 1988?
A. No.
Q. Are you aware of anyone in your family that supported him after 1988?
A. I don't know.
Q. When Mr. Luong died, did you provide any financial support for the funeral or services?
A. No.
Q. I want to jump in time a little bit. I want to jump to 2016, after your brother was in -- in custody at Santa Rita Jail.
I understand you visited him often. Can you tell me how often you visited?
A. Most of the Saturdays, pretty much. Every Saturday.
Q. And did you go alone?
A. I went with my sister-in-law.
Q. Ai Zhong?
A. Yes.
Q. And during these visits, did you ever observe any -- any medical problems that concerned you?
A. Yes.
Q. What medical problems did you see during these

STATE OF CALIFORNIA) SS.

I do hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of the said witness was reported by me, a certified shorthand reporter and disinterested person, and was under my supervision thereafter transcribed into typewriting, and when so transcribed was carefully read to or by the said witness, and, being in every desire, was thereafter by the said witness duly subscribed; that if unsigned by the witness, signature has been waived in accordance with stipulation between counsel for the respective parties.

And I further certify that I am not of counsel or attorney for either or any of the parties to said deposition nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 27th day of June, 2019.

Clare Macy

CLARE MACY,

Certified Shorthand Reporter